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10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 TERESA SIVIL,

13 Plaintiff,

14 vs.

15 COUNTRY MUTUAL INSURANCE
16 COMPANY, a foreign corporation;
DOES I through X; and ROE
CORPORATIONS I through X,

Defendants.

CASE NO. 2:20-cv-00244-JAD-EJY

STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(SECOND REQUEST)

17 Pursuant to LR IA 6-1 and LR II 26-4, the parties request a **forty five (45) day** extension
18 of the close of discovery deadline as set forth below in order to accomplish the depositions of
19 several witnesses to the matter at issue. This stipulation is filed at least 21 days before the
20 earliest deadline sought to be extended, i.e., the close of discovery deadline, and is the parties'
21 first request for an extension of time. In support of this request, the parties inform the Court of
22 the following:

23 The nature of this action involves a dispute over insurance coverage and allegations of
24 breach of contract, bad faith, unfair trade practices, and declaratory relief.

25 (a) Discovery completed: the parties have exchanged lists of witnesses and relevant
26 documents and have each propounded and responded to written discovery; the deposition of non-
27 party witness, Melissa Izatt, was taken in Anchorage, Alaska, on October 5, 2021;

28 (b) Remaining scheduled discovery: (1) deposition of Sarah Muranaka, witness and

Fed. R. Civ. P. 30(b)(6) witness for Country Mutual Insurance Company is scheduled for November 16, 2021 in Salem, Oregon; (2) deposition of Plaintiff is scheduled for November 19, 2021; (3) deposition of witness, Keith Nordlof is scheduled for November 19, 2021; (4) Plaintiff's responses to Defendant's Second Request for Production are due on November 22, 2021.

(c) Remaining unscheduled discovery: deposition of non-party Tiffany Cosper in Anchorage, Alaska.

(d) Reason for discovery not being able to be completed by December 1, 2021 deadline: the parties have been diligent in conducting discovery and the extended deadline of December 1, 2021, has not yet passed. However, during the October 5, 2021 deposition of non-party Melissa Izatt, the parties were advised that Tiffany Cosper, while no longer employed by Ms. Izatt, is available and willing to give a deposition in Anchorage, Alaska. The parties have not been able to schedule the deposition in November but have tentative availability in December. However, Plaintiff's counsel may be in trial in mid December and that, combined with the holidays, may require some additional time to complete this one remaining deposition. Ms. Cosper is the primary person who communicated with Plaintiff regarding the insurance coverage at issue herein and her testimony is essential to the claims and defenses in this case.

(e) Proposed schedule for completing remaining discovery:

SCHEDULED EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Expert Disclosures	CLOSED	Unchanged/past
Rebuttal Expert Disclosures	CLOSED	Unchanged/past
Discovery Cutoff	12/01/2021	01/14/2022
Dispositive Motions	01/03/2022	02/14/2022

Proposed Joint Pretrial Order 02/01/2022 03/16/2022¹
forty-five (45)

This request for an extension of time seeks ~~sixty (60)~~ additional days to accomplish the final necessary out of state deposition and is not sought for any improper purpose including delay.

DATED this 22nd day of October, 2021.

ROGERS, MASTRANGELO, CARVALHO
& MITCHELL

BOWEN LAW OFFICES

/s/ Rebecca Mastrangelo

/s/ Jerome Bowen

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ORDER

IT IS SO ORDERED this 22 day of October, 2021.


U.S. MAGISTRATE JUDGE

SUBMITTED BY:
ROGERS, MASTRANGELO, CARVALHO
& MITCHELL

/s/ Rebecca Mastrangelo

REBECCA L. MASTRANGELO, ESQ.
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¹ However, if dispositive motions were to be filed, the deadline for the Proposed Joint Pretrial Order would be deferred until 30 days after the Court rules on the dispositive motions.